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25 **UNITED STATES DISTRICT COURT**
26 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

27 CHASOM BROWN, MONIQUE
28 TRUJILLO, WILLIAM BYATT, JEREMY
29 DAVIS, and CHRISTOPHER CASTILLO,
30 individually and on behalf of all similarly
31 situated,

32 Plaintiffs,

33 v.

34 GOOGLE LLC,
35 Defendant.

36 Case No. 4:20-cv-03664-YGR-SVK

37 **JOINT STIPULATION AND [PROPOSED]**
38 **ORDER EXTENDING TIME FOR**
39 **GOOGLE TO SUBMIT OPPOSITION TO**
40 **PLAINTIFFS' MOTION FOR LEAVE TO**
41 **AMEND COMPLAINT (DKT. 395) AND**
42 **DECLARATION IN SUPPORT OF**
43 **PLAINTIFFS' MOTION TO SEAL (DKT.**
44 **394)**

45 Judge: Honorable Yvonne Gonzalez Rogers

46 Case No. 4:20-cv-03664-YGR-SVK

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48 **JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT**
49 **OPPOSITION TO PLAINTIFFS' MOTION FOR LEAVE (DKT. 395) AND MOTION TO SEAL (DKT. 394)**

1 Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between
2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on February 3, 2022, Plaintiffs filed their Administrative Motion To Consider
4 Whether Portions Of Motion for Leave To Amend Complaint Should Be Sealed (“Motion to Seal”)
5 (Dkt. 394) and their Motion for Leave To Amend Complaint (“Motion for Leave”) (Dkt. 395);

6 WHEREAS, on February 3, 2022, Google received unredacted copies of Plaintiffs’ Motion
7 for Leave and exhibits, approximately 43 of which were designated to be sealed and submitted with
8 Dkts. 394, 395;

9 WHEREAS, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, the current
10 deadline for Google to respond to the Motion for Leave (Dkt. 395) is by Thursday, February 17,
11 2022;

12 WHEREAS, pursuant to Civil Local Rule 79-5(e), the current deadline for Google, as the
13 Designating Party to Plaintiffs’ Motion to Seal (Dkt. 394), to establish that such designated material
14 is sealable, is by Thursday, February 10, 2022;

15 WHEREAS, the Parties agree that an extension of time of 8 days will provide Google with
16 sufficient time to respond to the Motion for Leave (Dkt. 395);

17 WHEREAS, the Parties agree that an extension of time of 7 days will provide Google with
18 sufficient time to submit its declaration in support of Plaintiffs’ Motion to Seal (Dkt. 394);

19 NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall
20 submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 394), to February 17, 2022, and
21 the deadline by which Google shall submit its response to Plaintiffs’ Motion for Leave (Dkt. 395),
22 to February 25, 2022.

23 DATED: February 8, 2022
24

25 QUINN EMANUEL URQUHART &
SULLIVAN, LLP

26 /s/ Andrew H. Schapiro
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Attorneys for Plaintiffs

1 **ATTESTATION OF CONCURRENCE**

2 I am the ECF user whose ID and password are being used to file this JOINT STIPULATION
3 AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT OPPOSITION TO
4 PLAINTIFFS' MOTION FOR LEAVE TO AMEND COMPLAINT (DKT. 395) AND
5 DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION TO SEAL (DKT. 394). Pursuant to
6 Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the
7 filing of this document

8
9 Dated: February 8, 2022

By /s/ Andrew H. Schapiro

10 Andrew H. Schapiro

11 *Counsel on behalf of Google*

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1 **[PROPOSED] ORDER**

2 Pursuant to stipulation of the Parties, the Court hereby **ORDERS**:

3 The deadline for Google to submit a Declaration in support of Plaintiffs' Motion to Seal
4 (Dkt. 394), shall be extended to February 17, 2022, and the deadline for Google to submit its
5 response to Plaintiffs' Motion for Leave (Dkt. 395), shall be extended to February 25, 2022.

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7 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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9 DATED: February 16, 2022

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HON. YVONNE GONZALEZ ROGERS
11 United States District Judge

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